

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**UNITED STATES OF AMERICA  
upon the relation and for the use of the  
TENNESSEE VALLEY AUTHORITY**

**Plaintiff**

**v.**

**AN EASEMENTS AND RIGHTS-OF-WAY  
OVER 9.97 ACRES OF LAND, MORE OR  
LESS AND ADDITIONAL RIGHTS WITH  
AND RIGHTS-OF-WAY OVER LAND IN  
SUMNER COUNTY, TENNESSEE, and  
GREGORY REAL ESTATE, LLC,  
A Wyoming limited liability company,**

**Defendants**

**Case No. 3:23-cv-00639  
JURY DEMAND**

**ANSWER TO COMPLAINT**

For answer to the Complaint, the Defendant, GREGORY REAL ESTATE, LLC, by and through its Chief Manager, ODRIC GREGORY, would state as follows:

1. Paragraph 1 does not require a response from this Defendant.
2. Admitted.
3. This Defendant does not have actual personal knowledge of the allegation contained in paragraph 3 but does not deny the purpose of the taking.
4. This Defendant does not have personal knowledge of the interest taken by the Tennessee Valley Authority but does not deny same.

5. The description as contained in Attachment 1 to the Complaint speaks for itself, and this Defendant does not deny same.

6. This Defendant would answer the allegations in this paragraph as follows:

(a) This Defendant, GREGORY REAL ESTATE, LLC, is a Wyoming Closed Limited Liability Company registered and qualified to do business in Tennessee and does own property as recorded in Record Book 1811, Page 783, in the Register's Office of Sumner County, Tennessee.

(b) This Defendant admits the Plaintiffs' ownership of the permanent easements and rights-of-way as recorded in Record Book 3653, Page 514, in the Register's Office of Sumner County, Tennessee.

(c) Admitted.

7. Paragraph 7 does not require a response from this Defendant.

Respectfully submitted,

s/Philip C. Kelly  
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*Attorney for Defendant, Gregory Real Estate, LLC*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Answer to Complaint was filed electronically through the Court's ECF system on the date shown in the document's ECF footer. Notice of this filing will be sent by operation of the Court's ECF system to all parties as indicated on the electronic filing receipt. (parties may access this filing through the Court's ECF system).

A copy of this document is being sent to counsel for the Plaintiff by U.S. mail at the following address:

James S. Chase  
TVA General Counsel's Office  
400 West Summit Hill Drive  
Knoxville, TN 37902-1401

s/Philip C. Kelly  
Philip C. Kelly (BPR #002381)  
Attorney for Defendant: Gregory Real Estate, LLC